

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
) NO. 2:15-cr-04268 JB
v.)
ANGEL DELEON,) DECLARATION OF RUSSELL M. AOKI,
JOE GALLEGOS,) THE COORDINATING DISCOVERY
EDWARD TROUP,) ATTORNEY ON DISCOVERY
LEONARD LUJAN,) PRODUCTIONS
BILLY GARCIA,)
EUGENE MARTINEZ,)
ALLEN PATTERSON,)
CHRISTOPHER CHAVEZ,)
JAVIER ALONSO,)
ARTURO ARNULFO GARCIA,)
BENJAMIN CLARK,)
RUBEN HERNANDEZ,)
JERRY ARMENTA,)
JERRY MONTOYA,)
MARIO RODRIGUEZ,)
TIMOTHY MARTINEZ,)
MAURICIO VARELA,)
DANIEL SANCHEZ,)
GERALD ARCHULETA,)
CONRAD VILLEGAS,)
ANTHONY RAY BACA,)
ROBERT MARTINEZ,)
ROY PAUL MARTINEZ,)
CHRISTOPHER GARCIA,)
CARLOS HERRERA,)
RUDY PEREZ,)
ANDREW GALLEGOS,)
SANTOS GONZALEZ,)
PAUL RIVERA, and)
SHAUNA GUTIERREZ,)
Defendants.)

I, Russell M. Aoki, hereby declare and state as follows:

1. I am the court-appointed Coordinating Discovery Attorney (CDA). I make the following statements based upon my personal knowledge, information, and belief.
2. Set out below is a chronology of Government discovery productions.
3. The first column is the date the discovery was produced by the Government as reflected in the cover letter that accompanied each production.
4. The second column is the case referenced, although all the discovery is to be shared with all the defendants in the related cases of *U.S. v. Garcia*, Case No. 2:15-cr-04275 JB, *U.S. v. Varela*, Case No. 2:15-cr-04269 JB, and *U.S. v. Baca*, Case No. 2:16-cr-01613 JB.
5. The third column sets out the manner in which we received the discovery. USAfx is the Government's cloud transfer system. Smaller productions were provided by way of USAfx. Larger productions were sent by next business-day FedEx.
6. The last column is a summary of the discovery produced. Our office performs no discovery analysis and therefore we can only provide a summary description based on the file names and/or the production letters produced by the Government.

DISCOVERY PRODUCTION DATE :	CASE	REC'D FROM GOVT VIA:	DESCRIPTION OF DISCOVERY PRODUCED:
3-18-16	Garcia	USAfx	Documents [Bates 1-1074]: (Bates 1-52; 56; 64-68; 81-787; 885; 922; 930-1030; 1051-1074); Originally Produced 3-18-16 (Bates 53-55; 57-63; 69-80; 788-884; 886-921; 1040-1050). Audio of UC buy and interviews.

DISCOVERY PRODUCTION DATE :	CASE	REC'D FROM GOVT VIA:	DESCRIPTION OF DISCOVERY PRODUCED:
3-25-16	DeLeon; Varela	USAfx	DeLeon Documents [Bates 1-2606]: VICTIM - 2001 F. Castillo (Bates 1-727); VICTIM - 2001 R. Garza (Bates 728-1284); VICTIM - 2007 F. Sanchez (Bates 1285-1582); VICTIM - 2014 J. Molina (Bates 1583-2253); VICTIM - 2015 J. Romero (Bates 2254-2316); VICTIMS -2015, D. Santistevan & G. Marcantel (Bates 2317-2606). Varela Documents [Bates 1-603]: VICTIM – P. Silva 2011 (Bates 1-131); VICTIM - A. Sosaya 2011 (Bates 132-603). Wiretap: M. Montoya, S. Griego, T. Clark, E. Duran phone calls and texts. Video: Assault on J. Molina & J. Romero. Audio: VICTIMS – 2015, G. Marcantel Audio#1-4.
6-17-16	Baca	USAfx; FedEx	Documents [Bates 1-2464]: VICTIM-2005 Shane Dix (Bates 1-696); VICTIM - 2014 Michael Giron (Bates 697-2098); VICTIM - 1998 F. Martinez (Bates 2099-2297); VICTIM - 2003 R. Contreras (2298-2464). Videos: 2005-Shane Dix homicide case interviews; Surveillance from Artisco Heritage and Good Fallas barbershop; Interviews of F. Quintana, Gallegos, R. Quintana, Ortiz, Armijo, F. Munoz. Richard Gallegos' cell phone data.
6-24-16	Baca	USAfx; FedEx	Documents [Bates 2465-6359]: CONSPIRACY-Overt Acts (Bates 2465-4724); VICTIM- 1998, F. Martinez (Bates 4725-4770); VICTIM - 2014, M. Giron (Bates 4771-4836); MISC (Bates 4837-5152); SNM Letters (Bates 5153-6359). Audios re: VICTIM-1998 F. Martinez and 2003 R. Contreras.
7-1-16	DeLeon	USAfx; FedEx	Documents [Bates 2607-8433]: MISC (Bates 2607-3169; 3233-3366; 6340-6352); VICTIM – 2001 F. Castillo (Bates 3367); VICTIM - 2001 R. Garza (Bates 3368); VICTIM - 2007 F. Sanchez (Bates 3170-3200; 3231-3232); VICTIM - 2015 J. Romero (Bates 3201-3230); VICTIM - 2015 D. Santistevan & G. Marcantel (Bates 3369-3379; 5981-6339); VICTIM - 2012 A. Burns (Bates 3380-5725); VICTIM - 2016 J. Gomez (Bates 5726-5980); Photos of VICAR defendants (Bates 6353-8433). Audio: 2015 Gregg Marcantel (CHS conversations); MISC audio (jail calls, CHS conversations); 2012 Adrian Burns (dispatch, interviews, video, jail calls). Adrian Burns cell phone records. Video: SNMCF re Murder F. Sanchez.

DISCOVERY PRODUCTION DATE :	CASE	REC'D FROM GOVT VIA:	DESCRIPTION OF DISCOVERY PRODUCED:
7-18-16	DeLeon	FedEx	Replacements of DVD 09 & 10 from 7-1-16 production: Surveillance of Adrian Burns.
7-22-16	DeLeon	USAfx	Audio file in .mp3 format (originally prod.7-1-16 in .wav): Jail call btwn Pup, Mom & Yvonne
7-26-16	Garcia	USAfx	Documents [Bates 1085-1302] and enhanced audio.
7-27-16	Garcia	USAfx; FedEx	C. Garcia's cell phone data & reproduction of 3-18-16 discovery (Bates 53-55; 57-63; 69-80; 788-884; 886-921; 1040-1050).
8-8-16	Baca	FedEx	F. Quintana and R. Gallegos jail calls.
8-11-16	Baca	USAfx	Documents [Bates 6360-7777]: VICTIM-2014 M. Giron (Bates 6360-6469; 7772-7777); CONSPIRACY-Overt Acts (Bates 6470-6603); MISC (Bates 6604-7771). Audio of interviews/overt act.

I declare under penalty of perjury under the laws of the United States the foregoing is true and correct.

DATED: August 29, 2016, at Seattle, Washington.



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